



LOWEY DANNENBERG



KIRBY MCINERNEY

June 2, 2022

**VIA ECF**

The Honorable Paul A. Engelmayer  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, New York 10007-1312

Re: *In re JPMorgan Treasury Futures Spoofing Litigation*,  
No. 1:20-cv-03515-PAE (S.D.N.Y.)

Dear Judge Engelmayer:

As counsel for Plaintiffs, we write in response to the Court's questions at the May 31, 2022 Fairness Hearing concerning the recovery among putative class members who submit claims in both this settlement and to the U.S. Department of Justice as it administers its Victim Compensation Fund.

Attached are redlines of the proof of claim and distribution plan that Plaintiffs believe address the Court's questions. *See* Exhibit A (proof of claim), Exhibit B (distribution plan). If the Court approves the attached, each will be posted promptly to the Settlement Website so that putative class members may access the materials and the settlement administrator will reach out to existing claimants to request that they update their already filed proof of claim.

We have conferred with counsel for JPMorgan, and they take no position on the proposed edits to the proof of claim and distribution plan.

Respectfully submitted,

/s/ Karen M. Lerner  
Kirby McInerney LLP  
Co-Counsel for Plaintiffs

/s/ Raymond P. Girnys  
Lowey Dannenberg, P.C.  
Co-Counsel for Plaintiffs

cc: All counsel of record (via ECF)